



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

PSS:ABK
F. #2012R01666

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 5, 2014

By ECF and First-Class Mail

Kevin J. Keating, Esq.
Law Office of Kevin J. Keating
666 Old Country Road
Garden City, NY 11530

Re: United States v. Eduard Munteanu
Criminal Docket No. 12-698 (SJF)

Dear Mr. Keating:

The undersigned is firewall counsel in the above-referenced case. Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby produces discovery with respect to this case. This letter supplements the government's discovery letters dated December 18, 2012, February 7, 2013, April 4, 2013, October 4, 2013, October 22, 2013, December 30, 2013, January 7, 2014, January 9, 2014, January 16, 2014, January 24, 2014, and February 4, 2014.

Enclosed please find two CDs, which collectively contain documents Bates numbered BOP_EMAIL 00000278 through BOP_EMAIL 00000346, and represent the defendant's emails from the period between January 2, 2014 and February 2, 2014, sent and received while the defendant was incarcerated at the Metropolitan Detention Center.

Before reviewing any of these potentially privileged materials, the government instituted firewall procedures. Pursuant to the firewall procedures, the investigators and prosecutors involved in the investigation and prosecution of the above-referenced case ("the investigative team") have not reviewed or been made aware of the substance of any communications between the defendant and his counsel.

The undersigned firewall counsel has reviewed and segregated the materials as follows: Materials contained on the "Clean Materials" CD, which contains documents Bates

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numbered BOP_EMAIL 00000278 through BOP_EMAIL 00000340, were provided to the investigative team on February 5, 2014. Materials contained on the CD labeled "Privileged and Confidential," which contains documents Bates numbered BOP_EMAIL 00000341 through BOP_EMAIL 00000346, have not been disclosed to the investigative team.

Should you have any questions regarding the enclosed materials, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Ameet B. Kabrawala
Ameet B. Kabrawala
Assistant U.S. Attorney
(718) 254-6001

Enclosures

cc: By ECF (without enclosures)

Clerk of Court (SJF)